

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE CONTACT RECORD

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**Date/Time:** February 1, 2001/1300

**Site Contact(s):** Jeff Stevens and Dyan Foss  
**Phone:** 5797 and 7577

**Regulatory Contact:** Shirley Garcia  
**Phone:** 303-438-6329

**Agency:** City of Broomfield

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**Purpose of Contact:** Discuss her comments of the 771 DOP modification responsiveness summary

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**Discussion:** Discussed the attached responses to her concerns on the 771 DOP modification responsiveness summary. Her comments are in black and K-H responses are in blue. Resolved the issues.

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**Contact Record Prepared By:** Dyan Foss *WAF*

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**Required Distribution:**  
Administrative Record

**Additional Distribution:**



Contact Record 4/10/00  
Rev. 10/11/00

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

1/2

1. (Item 18) The document states OPWL that are foamed or grouted will not be removed. I feel we need more dialogue to determine at what depth lines will be removed or will remain. The response infers lines within 3 foot of grade will also remain. All utilities, including process waste lines, will be removed if they are within 3 feet of the existing grade. OPWL within the buildings will be removed during decommissioning. OPWL under the buildings will be removed if these are associated with contaminated soils above Tier 1 action levels. The OPWL that are not associated with contaminated soils will be foamed or grouted in place and will not be removed. These OPWL will be flushed during decommissioning.
2. (#57) The issue of proposed changes to the RSOP for Recycling Concrete has not been resolved. Broomfield would like to review the prepared information on this activity. The response that "once this information is available, it will be presented at a D&D Pizza meeting" will be presented after the 771 DOP is potentially approved. Broomfield is also interested in the impacts this change may have to ER activities and a lifetime subsidence requirement of < 1%. This change will definitely have long-term stewardship implications. The information cannot be given to Broomfield because it has not been developed. The backfill process at 771 still has to meet the lifetime subsidence requirements in the RSOP for Recycling Concrete. The long-term stewardship issues associated with the activity will be assessed. The land configuration design basis and groundwater balance study are currently under way. If the DOP can be approved with this option, then those studies can evaluate the activity. If the engineering assessment indicates that a lifetime subsidence of less than 1% cannot be achieved, or the studies indicate that the backfill will have a negative impact on long term stewardship; then the activity will not be completed as indicated in the DOP.
3. (#60) The decommissioning of the incinerator is a key activity associated with 771. Other than the pending final characterization results of the incinerator, the details of the plans for the removal of the incinerator should be included. In hindsight, the incinerator specific closure language could have been included in the DOP, but the characterization information would not have been available prior to the public comment period. Regardless, the methodology for the incinerator closure is already included in Section 6. Closing the incinerator under a CDD will provide much more specific information than included in the DOP. The reason for this is that the incinerator system is much more complex (both physically and chemically) than the Bldg. 774 tank systems included in the DOP. The CDD will be similar to previous tank systems in 771. The draft CDD will be submitted to DOE within the next two weeks. It is anticipated that CDPHE will receive a copy within the next month.
4. (#91 & 92) To be consistent with other DOPs, the Unit Information Sheets should be included within the DOP. Again, I feel the DOP is specific to the 771 Building. The specific information such as associated EPA codes and identified closure methods should be identified. Stakeholders do not review the CDD or the RCRA Permit. All tanks in 771 have CDPHE approved CDDs, which contain drawings and unit information sheets. RCRA closure is already authorized under the CDDs. RCRA units can be closed under the permit with a CDD or under a RFCA decision document. It is one or the other, not both. The closure methodology is included in the DOP (Section 6). EPA codes are included in Table 10 for tank systems in 774. Additionally, unit specific information sheets and drawings are provided in Appendix A and B for 774 tanks. The EPA codes have been identified for the RCRA permitted rooms and gloveboxes (a total of 11 units) in 771 and 774.